

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Pierre G. Thorsen,

Plaintiff,

v.

Community Unit School District 300,

Defendant.

Case No. 3:20-cv-50132

Judge Iain D. Johnston

Magistrate Judge Margaret J. Schneider

JOINT STATUS REPORT

Plaintiff Pierre G. Thorsen (“Thorsen”) and Defendant Community Unit School District 300 (“D300”), hereby submit the following joint status report:

- A. Defendant, D300, and Plaintiff, Thorsen, submitted Rule 26(1) disclosures on or about August 30, 2021.
- B. Plaintiff submitted his responses to a Request to Admit and Interrogatories on or about October 29, 2021.
- C. Defendant answered Interrogatories and a Notice to Produce on December 16, 2021, with many objections which included objections based on State and Federal limitations on the disclosure of student record information. Defendant supplemented its production on January 29, 2022. Defendant has produced over 600 pages of responsive records in addition to the substantive responses to Plaintiffs Interrogatories and Requests to Produce.
- D. On December 17, 2021, Plaintiff initially requested a F.R.C.P. 26 (b)(5) privilege log regarding documents withheld for privilege. The District provided Plaintiff with a privilege log on January 29, 2022.

- E. Plaintiff and Defendant have not resolved their differences over the District's discovery responses, despite exchanges over the past months. The District continues to maintain that it has provided relevant information in its possession proportionate to the needs of the case. Plaintiff continues to seek discovery of additional information. This court has received briefs on Plaintiffs Motion to Compel.
- F. CUSD 300 took the deposition of Pierre Thorsen on June 7, 2022. Pierre Thorsen took the depositions of Mike Williamson, June 8, 2022, Colleen O' Keefe, June 16, 2022, and Lynn Adler, June 30, 2022. Pierre Thorsen is scheduled to take the deposition of Kara McMahon August 10, 2022. CUSD 300 has no other witnesses disclosed order F.R.Civ.P.26.
- G. On July 22, 2022, Thorsen served CUSD 300 with Supplemental Rule 26(A)(l) Disclosures, giving greater details regarding testimony from Thorsen and four other previously disclosed witnesses, as well as four new witnesses. District 300 does not consider this testimony or these witnesses relevant to any issues in dispute in this Title VII employment discrimination case.
- H. Pierre Thorsen has been attempting to take the deposition of Aliya Chaudhry, with the cooperation of her approved counsel. Counsel for Aliya Chaudhry wants only one deposition for all three cases and is working on giving out dates in late August and September. Counsel for D300 only learned of this in the past week. D300 objects to the necessity and relevance of this deposition in this Title VII employment discrimination case.
- I. Thorsen expects to complete deposition fact discovery by October 15, 2022. Thorsen has not yet seen whether more documents will be produced, as a result of his Motion

to Compel, and more discovery is needed. Thorsen has not yet had the opportunity to take Aliya Chaudhry's deposition. If necessary Thorsen will bring a Motion to Extend the fact discovery deadline.

J. D300 objects to any extension of discovery, including for the limited purpose of obtaining the deposition of Aliya Chaudhry. Plaintiff had ample opportunity to pursue this deposition prior to this time. As a student, Ms. Chaudhry would not possess any relevant knowledge of Plaintiff's employment relationship or knowledge of the circumstances under which he resigned his job. Plaintiff has not pursued other avenues to address any issues which he believes Ms. Chaudhry's testimony would address, to include proposed stipulations of fact. Continuing discovery at this point only serves the purpose of delay; it will not bring greater clarity to the issues in dispute in this Title VII employment discrimination matter. All individuals were identified to have relevant knowledge of the circumstances under which Plaintiff resigned his job and the District's disciplinary actions have been deposed (or will be before the scheduled close of discovery). This case has been pending for over two years. The District is prepared to move forward with a Motion for Summary Judgment. D300 requests a status hearing to set a briefing schedule for a Motion for Summary Judgment that accounts for resolution of any outstanding discovery issues remaining after resolution of Plaintiff's Motion to Compel.

Dated: August 10, 2022

PIERRE G. THORSEN

By: /s/Timothy J. Lowery
Timothy J. Lowery
Hanson Law Group LLP

Dated: August 10, 2022

COMMUNITY UNIT SCHOOL
DISTRICT 300

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